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Attorneys for Plaintiff

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION

UNITED STATES OF AMERICA,	)	CR No. 08-0164 MHP
	)	
Plaintiff,	)	STIPULATION AND [PROPOSED] ORDER
	)	EXCLUDING TIME
v.	)	
	)	
W. SCOTT HARKONEN,	)	
	)	
Defendant.	)	
	)	

On May 5, 2008, the parties in this case appeared before the Honorable District Court Judge Marilyn Hall Patel and stipulated that time should be excluded from the Speedy Trial Act calculations from May 5, 2008 to September 15, 2008, at which time the parties are scheduled to appear before Judge Patel for further status conference.

The parties represented that granting the continuance was necessary for effective preparation

1 of counsel given the complexity of the case, nature of the prosecution, and voluminous  
2 discovery, taking into account the exercise of due diligence. See 18 U.S.C. § 3161(h)(8)(B)(iv).

3 SO STIPULATED:

4 BRIAN J. STRETCH  
5 Acting United States Attorney

6 DATED: April 17, 2008

7 /s/  
8 IOANA PETROU  
Assistant United States Attorney

9 DATED: April 17, 2008

10 /s/  
11 WILLIAM M. GOODMAN  
Attorney for W. Scott Harkonen

12 As the Court found on May 5, 2008, and for the reasons stated above, the Court finds that  
13 the ends of justice served by the continuance outweigh the best interests of the public and the  
14 defendant in a speedy trial and that time should be excluded from the Speedy Trial Act  
15 calculations from May 12, 2008 to September 15, 2008 for effective preparation of counsel. See  
16 18 U.S.C. §3161(h)(8)(A). The failure to grant the requested continuance would deny counsel  
17 reasonable time necessary for effective preparation, taking into account the complexity of the  
18 case, nature of the prosecution, and voluminous discovery, and would result in a miscarriage of  
19 justice. See 18 U.S.C. §3161(h)(8)(B)(iv).  
20

21 SO ORDERED.

22 DATED: \_\_\_\_\_

23 \_\_\_\_\_  
24 Marilyn Hall Patel  
25 District Court Judge  
26  
27  
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